

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

UNITED STATES, et al.,	)	
	)	
Plaintiffs,	)	
v.	)	No. 1:23-cv-00108-LMB-JFA
	)	
GOOGLE LLC,	)	
	)	
Defendant.	)	

**PLAINTIFFS’ MOTION FOR LEAVE TO FILE UNDER SEAL**

Pursuant to Local Civil Rule 5(C) and the Protective Order (ECF No. 98 and Modified Protective Order at ECF No. 203), Plaintiffs, through their undersigned counsel, hereby respectfully move this Court to seal portions of and certain exhibits to their Opposition to Defendant Google LLC’s Motion to Exclude the Testimony of Adoria Lim. The redacted portions contain material Google, third parties, and certain federal agency advertisers have designated as confidential. Consistent with the local rule and this Court’s Electronic Case Filing Policies and Procedures, undersigned counsel have filed the materials at issue using the sealed filing event on CM/ECF and hereby certify that they will serve a copy on opposing counsel and deliver a copy to this Court in a separate container labeled “UNDER SEAL.” The grounds for this motion are contained in the memorandum of law concurrently filed in support of this motion. A proposed order is attached for the Court’s convenience.

Dated: May 17, 2024

Respectfully submitted,

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